



From: **9-AWA-AFS-300-Correspondence (FAA)** <9-AWA-AFS-300-Correspondence@faa.gov>

Date: Fri, Feb 27, 2026, 9:19 AM

Subject: Request for Information regarding guidance to receiving LOA / A025 for electronic record keeping for General Aviation (GA), called BetterPlane™

Dear Sirs,

Thank you for your inquiry to AFS-300 regarding a Letter of Authorization (LOA) A025. The Aircraft Maintenance Division, Airman & Special Projects has reviewed your request. Specifically, you asked for clarification of the following question:

Question: We are looking for guidance, as AC 120-78B indicates that, for any record retention system seeking OpSpec A025 or an equivalent letter, the process begins with the FSDO.

BetterPlane (TM) launched late last year as an app for iOS and Android. It offers the GA community the ability to digitize aircraft logbooks, and is coupled with an AI-powered OCR engine that translates the image into readable, editable text -- though the original image remains the source of truth and cannot be altered. All logs are stored in the cloud, on redundant servers, and password protected. The goal is to provide a Certified Copy of logbooks that is acceptable to and meets FAA standards, in case logs are lost, stolen, or destroyed.

Additionally, BetterPlane provides pilots, mechanics, and aircraft custodians a common share point for the viewing and exchange of information, and alerts for scheduled maintenance items, while tracking hours and due dates for aircraft component/system service lives.

We'd like to ensure that this system meets the guidelines of AC 120-78 and any other applicable standards.

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Response: We have reviewed your inquiry, and this is the FAA's response:

1. 14 CFR parts 43 and 91 do not stipulate the medium in which a maintenance record is documented, provided it meets the requirements of §43 & §91Subart E.
2. FAA Advisory Circular AC 43-9D, Paragraphs 15 – 16, provide guidance for *Lost or Destroyed Records* and for *Computerized Records*. *"Note: An operator may utilize a commercially available application and service to fully scan records required by 14 CFR § 43.9 or § 91.417 into a digital format. These digitized records can then be safely uploaded into various applications, making them secure and searchable."*
3. FAA Advisory Circular AC 120-78B is guidance and a method for electronic signatures, electronic recordkeeping, and electronic manual systems and is not regulatorily binding. This AC can be used for most all 14 CFR operating and airmen certificate holders in the development of electronic storage systems. As per paragraph 19.5 *"There is No Requirement for Formal Approval, Acceptance, or Authorization for 14 CFR Part 61, 63, 65, 91 (excluding 91K), 129, or 137."*
4. Letter of Authorization (LOA) Operations Specifications that are issued to 14 CFR part 91 operators typically establish operating safety standards required by an operational regulation, and within those LOAs operating safety standards, there may be record documenting requirements.

The inspector's guidance for issuing LOA / A025 can be found in FAA Order 89001, Volume 3, Chapter 31, Section 2. Specifically, paragraph 3-3006: *"THERE IS NO REQUIREMENT FOR FORMAL APPROVAL, ACCEPTANCE, OR AUTHORIZATION FOR 14 CFR PART 61, 63, 65, 91 (EXCLUDING 91K), 129, OR 137."* *The use of an electronic signature, electronic recordkeeping system, or electronic manual system under 14 CFR part 61, 63, 65, 91 (excluding 91K), 129, or 137 does not require formal FAA approval, acceptance, or authorization. OpSpec A025 does not apply to operations under these parts. However, the policy and standards for electronic signatures, records, and manuals should act as a guideline for these operations."*

Because of the approval, acceptance and authorization requirements set forth in FAA Order 89001 Volume 3, Chapter 31, ensuring compliance with the issued LOA for GA Part 91 operators under A025 would present significant challenges in terms of workload and manpower requirements. When the FAA issues the A025 LOA, they need to review and approve a policy and procedure manual customized to fit the specific needs & complexity of the owner/operator. Although your product serves as a tool within this manual, the FAA focuses only on whether the policies and procedures outlined meet the requirements of A025 and its guidelines.

The FAA does not evaluate the products used in the manual, as giving feedback on specific products could be seen as favoring one product over another, which would be inappropriate.

We trust this addresses your concerns. Thank you for your interest in aviation safety.

/CARLTON KITCHENS, AFS-300